

SHON T. ERWIN, U.S. Magistrate Judge
Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN THE MATTER OF THE SEARCH OF THE)	
PERSON OF DAUD HASSAN JABRIL)	Case No. M-23-222-STE
CURRENTLY DETAINED AT THE)	
GRADY COUNTY JAIL)	

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Brad E. Harper, Task Force Officer of the Drug Enforcement Administration (DEA),
United States Department of Justice, being duly sworn, deposes and state as follows:

INTRODUCTION

1. I am a “federal law enforcement officer” within the meaning of Rule 41 of the Federal Rules of Criminal Procedure. I am currently assigned to the DEA Task Force Group in the Oklahoma City District Office of Oklahoma as a deputized DEA Task Force Officer (TFO). Since becoming a TFO, I have been involved in a wide variety of investigative matters, including numerous investigations targeting large criminal enterprises, most of which involved the unlawful distribution of narcotics in violation of 21 U.S.C. §§ 841(a)(1) and 846. Prior to being assigned to the DEA Task Force Group, I served as a deputized FBI Task Force Officer. I have been employed by the Oklahoma City Police Department (OCPD) since March 1997 and hold the title of Inspector within OCPD. I have specific training and experience in numerous methods of investigation, including, but not limited to, electronic and visual surveillance, interview and interrogation, search warrants, utilizing confidential sources/informants, pen registers, TIII wire intercepts, and undercover agents. I have executed numerous search and arrest warrants, conducted physical surveillance, coordinated controlled purchases of narcotics with confidential sources, analyzed records documenting the purchase and sale of illegal drugs, and I have worked with other local and federal law enforcement officers, regarding the manner

in which drug distributors obtain, finance, store, manufacture, transport, and distribute their illegal drugs. Through my training and experience, I have become familiar with some of the methods by which illegal drugs are imported, distributed, and sold, as well as the means used by drug dealers to disguise the source and nature of their profits.

2. This affidavit is submitted in support of an application for a search warrant to search the person of **Daud Hassan Jabril (JABRIL)** and obtain **JABRIL's** fingerprints, (as more fully described in Attachment B). Based upon the information set forth herein, there is probable cause to believe that located in the place described in Attachment A is evidence described in Attachment B, being evidence of violations of 21 U.S.C. § 846.

3. The statements contained in this Affidavit are based in part on information provided by other law enforcement officers, fingerprint examiners, and my experience, training and background. I have not included every fact known to me concerning this investigation, but have set forth only those facts necessary to establish probable cause to believe that evidence of the crimes referenced herein will be found on the items to be searched.

INVESTIGATION DETAILS

4. Mr. Jabril and his co-defendant Warsame Abirahman Ali are charged with conspiracy to possess with intent to distribute and to distribute more than 400 grams of fentanyl (Count 1) and possession of fentanyl with intent to distribute (Count 2). *See United States v. Ali, et al.*, CR-22-119-R (W.D. Okla.). The charges arise from a traffic stop that occurred on January 27, 2022; a subsequent probable cause search of the vehicle by police found more than 3.4 kilograms of blue M-30 fentanyl pills.

5. On December 20, 2021, the United States Postal Inspection Service (USPIS), Washington Division, intercepted a package that was found to contain approximately 424 grams

of blue M-30 fentanyl pills. Additional investigation confirmed that the parcel was being tracked through the mail by several IP addresses. Verizon subscriber records produced in response to a subpoena then identified that these IP addresses were connected to a device under a Verizon account in the name of **JABRIL** with a telephone number of (571) 499-0921. The United States Postal Service's Forensic Laboratory also conducted an examination of the intercepted package for latent fingerprints of value for identification. Five latent fingerprints were retrieved from the package; these latent fingerprints were then searched in the FBI's automated database and compared to the fingerprints pulled off the package, resulting in one of the fingerprints being identified as belonging to **JABRIL**.

6. The Forensic Laboratory Report, prepared by Kiandra R. Brown-Holliday, a Forensic Latent Print Analyst, states that “[c]learly and completely recorded fingerprints, to include tips of the fingers, of Daud Hasan Jabril will be required if additional comparisons are requested. . . . In the event latent print testimony is necessary in the trial of this case, a current set of known prints of Daud Hassan Jabril, recorded and signed by an individual who will be available to testify, should be submitted prior to any request for testimony.”

7. The United States is seeking to introduce evidence that **JABRIL's** fingerprint was located on the package in his upcoming trial, thus making the new set of prints necessary so that a complete examination may be done with a full set of fingerprints. While the U.S. Marshals have a digital record of Mr. Jabril's fingerprints, the Forensic Laboratory has advised that the digital record is likely of not sufficient quality and that a new set of prints are needed to perform the additional comparison and verification.

8. If the requested warrant is granted, inspectors with the U.S. Postal Inspection Service, in conjunction with the U.S. Marshals and/or officials at the Grady County Jail, will

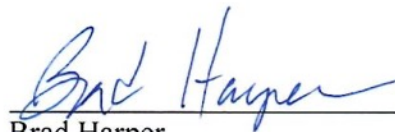
obtain a complete set of **JABRIL's** fingerprints.

CONCLUSION

9. Based on the aforementioned factual information, and my training and experience, I respectfully submit that there is probable cause to believe that located in the place described in Attachment A is evidence described in Attachment B, being evidence in violations of 21 U.S.C. § 846. Therefore, a complete set of **JABRIL's** fingerprints are sought so that the Forensic Laboratory may make a full comparison between the fingerprints on the intercepted parcel and **JABRIL's** fingerprints.

10. I respectfully request that the attached warrant be issued authorizing the search of the person described in Attachment A and seizure of the items described in Attachment B. In addition, I request that law enforcement be authorized to direct the person described in Attachment A to place his hands in certain positions for the purposes of fingerprinting and to apply fingerprinting substances necessary to transfer his fingerprints to a suitable fingerprinting card.

FURTHER AFFIANT SAYETH NAUGHT.



Brad Harper
DEA TFO

Sworn and subscribed before me this 10th day of April 2023.



SHON T. ERWIN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

DESCRIPTION OF LOCATION TO BE SEARCHED

The person of Daud Hassan Jabril, currently in custody at the Grady County Jail, located at 215 N. 3rd St., Chickasha, Oklahoma.

ATTACHMENT B

SPECIFIC ITEMS TO BE SEIZED

1. Complete rolled fingerprints of the person described in Attachment A, including the complete length of the fingers between the palms and the fingertips.

Law enforcement personnel are authorized to use means reasonably necessary to obtain the aforementioned items, including directing the person described in Attachment A to position his hands in various poses for fingerprinting and for applying substances to the fingers of the person described in Attachment A necessary to obtain the fingerprints.